

REMARKS

Reconsideration and allowance in view of the foregoing amendments and the following remarks are respectfully requested.

Claim 4 has been canceled. Claims 1, 2, 3, 8 and 15 have been amended. Claims 1-3 and 5-18 are pending in this application.

Claims 1-2, 4-6, 8-10 and 15 stand rejected under 35 U.S.C. §102(e) as being anticipated by Thomas et al. Applicant traverses the rejection for the following reasons.

First of all, applicant submits that Thomas should be removed from prior art. Please note that the filing date of Thomas et al. is June 25, 2002 which is later than the filing date of the present application which is November 22, 2001. In order to perfect the claim for priority, Applicant herewith submits a verified translation of the priority application.

Nonetheless, Applicant has amended independent claims 1 and 8 to clearly distinguish the claimed invention over the prior art presented by the Examiner and to expedite the prosecution. In particular, Applicant has added the step of forming a barrier layer and a second metal interconnection on the capacitor in sequence, as recited in claim 1, as amended. Amended claim 8 also recites similar limitations. Applicant submits that none of the references submitted by the Examiner discloses or teaches this limitation. For example, Thomas does not show a barrier layer between a second electrode 27 of the capacitor and the second metal interconnection 28. In contrast, the present invention includes the step of forming a barrier layer 175 and a second metal interconnection 180 on the capacitor in sequence.

Therefore, applicant respectfully submits that the claimed invention is clearly distinguished from the prior art presented by Examiner, and therefore, claims 1 and 8 and their dependent claims 2, 4-6, 9-10 and 15 are not anticipated by Thomas et al. under 35 U.S.C. §102(e).

Claim 7 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Thomas et al. taken with Lur et al. Claims 11-14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Thomas et al. taken with Park et al. As set forth above, Thomas et al. should be removed from prior art. Accordingly, these rejections are also deemed moot.

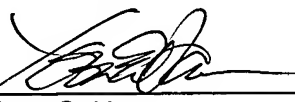
Applicant notes with appreciation that claims 16-18 are allowed.

The Examiner states that claim 3 would be allowable if rewritten in independent form including all of limitations of the base claim and any intervening claims. As noted above, claim 1 is believed allowable. Therefore, claim 3, which is dependent on claim 1, is also allowable.

All objections and rejections having been addressed, it is respectfully submitted that claims 1-3 and 5-18 are now in condition for allowance and a notice to that effect is earnestly solicited. If any issues remain to be resolved, the Examiner is cordially invited to telephone the undersigned attorney at the number listed below.

Respectfully submitted,

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